

MARILYN E. BEDNARSKI (No. 105322)
DAVID S. McLANE (No.124952)
CAITLIN S. WEISBERG (No. 262779)
mbednarski@kmbllaw.com
KAYE, McLANE, BEDNARSKI & LITT, LLP
234 East Colorado Boulevard, Suite 230
Pasadena, California 91101
T: (626) 844-7660 / F: (626) 844-7670

Attorneys for Plaintiff OBIE STEVEN ANTHONY, III.

HERMEZ MORENO, ESQ. (No. 72009)
BRIAN M. BUSH, ESQ. (No. 294713)
moreno@boucher.la; bush@boucher.la
21600 Oxnard St. Suite 600
Woodland Hills, California 91367
(818) 340-5400 F (818) 340-5401

Attorneys for Plaintiff REGGIE D. COLE

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

REGGIE D. COLE,
Plaintiff,


v.

CITY OF LOS ANGELES et al.,
Defendants.

OBIE S. ANTHONY, III,
Plaintiff,

v.

CITY OF LOS ANGELES et al.,
Defendants.

2014 DEC 23 PM 3:26
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES
BY: 

ORIGINAL

Case No. CV 11-03241-CBM (AJWx)
Case No. CV 12-01332-CBM (AJWx)
Case No. CV 13-07224-CBM (AJWx)

[Honorable Consuelo B. Marshall]

**PLAINTIFF'S UNOPPOSED EX
PARTE APPLICATION TO FILE
UNDER SEAL PURSUANT TO L.R.
79-5.1 AND PROTECTIVE ORDER
EXHIBITS IN SUPPORT OF JOINT
OPPOSITION TO CITY
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

[Filed concurrently with [proposed]
order, notice of under seal filing, lodged
documents].

1 OBIE S. ANTHONY, III,

2 Plaintiff,

3 v.

4 COUNTY OF LOS ANGELES, et al.,

5 Defendants.

Date: January 13, 2015 at 10:00 a.m.

Ctrm: 2

6
7 Plaintiff's Obie Anthony and Reggie Cole hereby file this unopposed *ex parte*
8 application to file under seal certain internal affairs documents pertaining to
9 defendant Marcella Winn, certain personnel documents pertaining to defendants
10 Marcella Winn and Pete Razanskas, and policies of the Los Angeles Police
11 Department under seal pursuant to protective orders entered into by the parties in
12 this case. The City defendants have no opposition to this application, and this
13 application is made pursuant to the protective orders entered into and approved by
14 the Honorable Andrew J. Wistrich, United States Magistrate Judge. This application
15 is based on the declaration of David S. McLane

16
17 KAYE, McLANE, BEDNARSKI & LITT, LLP

18 DATED: Dec. 23, 2014

By:


MARILYN E. BEDNARSKI

DAVID S. McLANE

CAITLIN S. WEISBERG

Attorneys for Plaintiff Obie S. Anthony, III

22 LAW OFFICES OF HERMEZ MORENO, PLC

24 DATED: Dec. 23, 2014

By:

/S/ Hermez Moreno

HERMEZ MORENO, ESQ.

BRIAN M. BUSH, ESQ.

Attorneys for Plaintiff Reggie Cole

DECLARATION OF DAVID S. McLANE

I, David S. McLane, hereby state and declare as follows:

1. I am an attorney of record for Obie Anthony in this case, and I file this declaration in support of Obie Anthony and Reggie Cole's *ex parte* application to file documents under seal in this case.

2. The City of Los Angeles, Marcella Winn and Pete Razanskas stipulated to protective orders, signed by the Honorable Andrew J. Wistrich, concerning internal affairs documents pertaining to defendant Marcella Winn, certain personnel documents pertaining to defendants Marcella Winn and Pete Razanskas, and policies of the Los Angeles Police Department. Pursuant to the protective order, it is required that if those documents are filed with the Court, that the party filing them must file an application under Local Rule 79-5.1 to file them under seal.

3. I am filing this application so that I can file certain protective order documents relevant to Plaintiff Obie Anthony and Reggie Cole's opposition to the City defendants' motion for summary judgment. These documents include internal affairs documents pertaining to Marcella Winn, training records for Marcella Winn and Pete Razanskas, and certain policies of the Los Angeles Police Department. We will serve these documents on the City defendants.

4. I emailed Susan Coleman, the attorney of record for defendants Winn, Razanskas and the City of Los Angeles on December 23, 2014, and she had no opposition to this application.

5. The documents I am requesting to file under seal will be lodged with this application.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: December 23, 2014

By 

PROOF OF SERVICE

I, Rose Ruiz, declare that I am a resident or employed in Los Angeles County, California; that my business address is 234 E. Colorado Blvd., Suite 230, Pasadena, California 91101; that I am over the age of eighteen years; that I am not a party to the within action; that I am employed in the Law Offices of KAYE, McLANE, BEDNARSKI & LITT, LLP, whose partners are members of the bar of the State of California and the court in which this action has been brought, and at whose direction, on December 23, 2014, I served this document:

- **[PROPOSED] ORDER RE: PLAINTIFF'S UNOPPOSED EX PARTE APPLICATION TO FILE UNDER SEAL PURSUANT TO L.R. 79-5.1 AND PROTECTIVE ORDER EXHIBITS IN SUPPORT OF JOINT OPPOSITION TO CITY DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**
- **PLAINTIFF'S UNOPPOSED EX PARTE APPLICATION TO FILE UNDER SEAL PURSUANT TO L.R. 79-5.1 AND PROTECTIVE ORDER EXHIBITS IN SUPPORT OF JOINT OPPOSITION TO CITY DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

I am readily familiar with the firm's practice of processing documents for mailing and service. Service of the above-referenced document was completed according to ordinary business practice, using the following method of service:

- ☒ The document was placed in sealed envelope(s) for collection and shipping via U.S.P.S. First Class mail, addressed as follows:
- ☐ The document was placed in sealed envelope(s) for collection and hand-delivery by messenger, addressed as follows:
- ☒ The document was transmitted by e-mail as an attachment, addressed as follows:
- ☐ The document was transmitted by facsimile, addressed as follows:

Hermez Moreno
Law Offices of Hermez Moreno
21600 Oxnard Street, Suite 600
Woodland Hills, CA 91367
moreno@boucher.la
bush@boucher.la

Susan Coleman
Burke, Williams & Sorensen, LLP
444 South Flower Street, Suite 2400
Los Angeles, CA 90071
scoleman@bwslaw.com

This proof of service is executed at Los Angeles, California, on December 23, 2014. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Rose Ruiz